

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

NO. 3:17-CR-328-O

LISA JANE BROWN (03)

FACTUAL RESUME

In support of Lisa Jane Brown's plea of guilty to the offense(s) in Count(s) One of the indictment, Brown, the defendant, William Biggs, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count One of the indictment, charging a violation of 21 U.S.C. § 846, 841(a)(1) and (b)(1)(C), that is, conspiracy to possess with the intent to distribute a controlled substance, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That two or more persons, including the defendant, reached an agreement to possess with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, as charged in the indictment;
- Second.* That the defendant knew of the unlawful purpose of the agreement; and
- Third.* That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose.

¹ Fifth Circuit Pattern Jury Instruction 2.95 (5th Cir. 2015).

The elements of possession with intent to distribute a controlled substance, a violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C) are as follows:²

- First.* That the defendant knowingly or intentionally possessed heroin as charged in the indictment;
- Second.* That the substance was in fact heroin; and
- Third.* That the defendant possessed the substance with intent to distribute it.

STIPULATED FACTS

1. Lisa Jane Brown admits and agrees that beginning on or about a date unknown and continuing until in or about June 2017, in the Dallas Division of the Northern District of Texas and elsewhere, she knowingly and intentionally combined, conspired, confederated, and agreed with other persons known and unknown to the grand jury, to commit the following offense against the United States: to possess with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C). All in violation of 21 U.S.C. § 846.

2. On June 6, 2016, Lisa Jane Brown was arrested for possession of a controlled substance in a Drug Free Zone after Wichita County law enforcement executed a search warrant on the home she shared with Jon Alan Brooks. Law enforcement seized 7.66 grams of heroin at that time.

² Fifth Circuit Pattern Jury Instruction 2.93 (5th Cir. 2015).

3. ^{nls lgtb} Brown admits that distributing heroin was her primary source of income for ^{a period of time} ~~approximately two years~~ during this conspiracy. Brown collected money from people for

the purchase of heroin, and would travel to the Dallas, Texas, area to purchase it from

various sources. Brown admits that ~~from approximately January 2014 through January~~ ^{lgtb nls}

~~2015,~~ Brown and Crystal Dawn Pond would travel to Dallas together to purchase heroin.

She stipulates that after acquiring the heroin, she distributed it to various customers.

Brown and Jon Alan Brooks also distributed heroin together. Brooks would accompany

her to Dallas to purchase heroin with the money she collected from various people in the

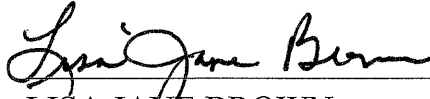
Wichita County area, and he would control the proceeds from her and Brooks'

distribution of the heroin.

4. The defendant agrees that she committed all the essential elements of the offense(s). This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count(s) One of the indictment.

AGREED TO AND STIPULATED on this 25th day of August, 2017.

JOHN R. PARKER
UNITED STATES ATTORNEY



LISA JANE BROWN
Defendant



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